



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Silvio J. Mollo Building  
One Saint Andrew's Plaza  
New York, New York 10007

May 14, 2019

**VIA ECF**

The Honorable Valerie E. Caproni  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: United States v. DiMarco and Von Ditmar,  
18 Cr. 863 (VEC)

Dear Judge Caproni:

The Government writes respectfully to request an extension of time—until June 3, 2019—for the parties to file any motions *in limine*, which are currently due on May 17, 2019. The reason for this request is that the Government anticipates that certain events occurring within the next two weeks will inform the nature and scope of the Government's motions. Specifically, the Government intends to seek a superseding indictment to, among other things, expand the timeframe of the charged conspiracy and add one or more substantive counts. In addition, the Government is in discussions with counsel for defendant Von Ditmar concerning the resolution of the charges against him, and the outcome of those discussions will also impact the Government's motions. Counsel for Von Ditmar consents to this request. Counsel for DiMarco does not oppose this request. Aside from the deadline for any opposition papers, the Government is not requesting the rescheduling of any other deadlines.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

by: \_\_\_\_\_/s/\_\_\_\_\_

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cc: All parties (via ECF)